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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RSUI INDEMNITY COMPANY, a New
Hampshire Stock Company; and EVANSTON
INSURANCE COMPANY, an Illinois corporation

PLAINTIFFS,

vs.

SPORTSMAN'S ROYAL MANOR, LLC, a
Nevada Limited Liability Company; DOMONIQUE
BROWNING-PALMER, individually; GARY
BRENNAN, individually;

DEFENDANTS.

SPORTSMAN'S ROYAL MANOR, LLC; GARY
BRENNAN;

COUNTER-CLAIMANTS,

vs.

RSUI INDEMNITY COMPANY; EVANSTON
INSURANCE COMPANY; KAERCHER
CAMPBELL & ASSOCIATES INSURNACE
BROKERAGE OF NEVADA, LLC; KAERCHER
INSURANCE, AN ALERA GROUP AGENCY,
LLC; and DOE DEFENDANTS 1-10; ROE
DEFENDANTS 11-20;

Counter-defendants.

Case No.: 2:20-cv-01484-RFB-VCF

**STIPULATION AND PROPOSED
ORDER TO EXTEND DEADLINES
FOR DEFENDANTS SPORTSMAN'S
ROYAL MANOR, LLC AND GARY
BRENNAN TO RESPOND TO
MOTIONS AND JOINDERS FILED
BY RSUI INDEMNITY COMPANY
AND EVANSTON INSURANCE
COMPANY [ECF NOS. 25, 26, 27, 32,
33, AND 34]**

FIRST REQUEST

Defendants/Counter-claimants, Sportsman's Royal Manor, LLC and Gary Brennan (collectively, "Sportsman's"), by and through their counsel, Armstrong Teasdale LLP, Plaintiff/Counter-defendant RSUI Indemnity Company ("RSUI"), by and through its counsel, Christian, Kravitz, Dichter, Johnson & Sluga, PLLC, Plaintiff/Counter-defendant Evanston Insurance Company ("Evanston"), by and through its counsel, Clyde & Co US LLP, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend Sportsman's deadline to December 4, 2020, to respond to the motions and joinders recently filed by RSUI and Evanston, including:

- Evanston Insurance Company's Motion to Strike Counterclaimants' Request for Exemplary Damages and Punitive Damages (ECF No. 25), filed November 3, 2020;
- Evanston Insurance Company's Joinder in RSUI Indemnity Company's Motion to Dismiss Counts 2 and 3 of Sportsman's Royal Manor, LLC and Gary Brennan's Counterclaims (ECF No. 26), filed November 3, 2020;
- Evanston Insurance Company's Motion to Dismiss Count 1 of the Counterclaim (ECF No. 27), filed November 3, 2020;
- RSUI's Joinder in Evanston's Motion to Strike Counterclaimants' Request for Exemplary Damages and Punitive Damages (ECF No. 32), filed November 4, 2020;
- RSUI's Joinder in Evanston's Motion to Dismiss Count One of the Counterclaim (ECF No. 33), filed November 4, 2020; and
- RSUI's Motion to Dismiss Counts 2 and 3 of the Counterclaim (ECF No. 34), filed November 4, 2020.

This is the first request to extend these particular deadlines.

Good cause exists to extend Sportsman's deadlines to respond to the above-identified Motions to Dismiss and to Strike and Joinders thereto to December 4, 2020. Due to the considerable number of pending Motions to Dismiss and to Strike and Joinders thereto as well as the upcoming Thanksgiving holiday, Sportsman's requires some additional time to be able to fully respond. RSUI and Evanston do not oppose such an extension of the response deadlines. This request is made in good faith and is not intended to unreasonably delay this matter. In particular, this case was only recently filed and the parties have not yet held their case conference under Fed. R. Civ. P. 26(f) nor has a scheduling order been entered.

Based on the foregoing, the parties respectfully request that this Court extend Sportsman's deadlines to respond to the above-identified Motions to Dismiss and to Strike and Joinders thereto to December 4, 2020.

Dated this 6th day of November, 2020.

ARMSTRONG TEASDALE LLP

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Dated this 6th day of November, 2020.

CLYDE & CO US LLP

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Dated this 6th day of November, 2020.

**CHRISTIAN, KRAVITZ, DICHTER,
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Dated this 6th day of November, 2020.

LIPSON NEILSON P.C.

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Nevada, LLC and Kaercher Insurance, an Alera
Group Agency, LLC*

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 10th day of November, 2020.